

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Jessica M. Heinz, Esq,**
CIPRIANI & WERNER, P.C.
450 Sentry Parkway, Suite 200
Blue Bell, Pennsylvania 19422
Attorneys for Defendants Aurobindo Pharma, Ltd., Aurobindo Pharma USA, Inc., and
Aurolife Pharma, LLC (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Steve Lucas, Senior Director of Quality Assurance and Technical Services, on April 21 and 22, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Cipriani & Werner, P.C., 450 Sentry Parkway, Suite 200, Blue Bell, Pennsylvania 19422, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

Marlene Goldenberg
Ben Stellpflug
GoldenbergLaw, PLLC
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Telephone: (612) 436-5028
Fax: (612) 367-8107
E-Mail: mjgoldenberglaw@goldenberglaw.com
bstellpflug@goldenberglaw.com

Ashleigh Raso
Meshbesh & Spence
1616 Park Avenue
Minneapolis, MN 55404
Telephone: (612) 930-0216
Fax: (612) 339-9188
E-Mail: araso@meshbesh.com

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 23, 2021

BURSOR & FISHER, P.A.

By: /s/ Andrew J. Obergfell
Andrew J. Obergfell

Joseph I. Marchese
Andrew J. Obergfell
888 Seventh Avenue
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
Email: aobergfell@bursor.com
jmarcchese@bursor.com

EXHIBIT A

30(B)(6) TOPICS

Aurobindo's Communications with Finished Dose Customers and Downstream Customers

33. Aurobindo's oral and written communications with its valsartan API Customers (including vertically integrated facilities) or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the Aurobindo API.
34. Aurobindo's oral and written communications with its valsartan finished dose Customers (including vertically integrated facilities) or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the Aurobindo finished dose.
35. Aurobindo's oral and written statements to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of Aurobindo's valsartan API.
36. Aurobindo's oral and written statements to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of Aurobindo's valsartan finished dose.
37. Aurobindo's product recall for valsartan API, including who Aurobindo communicated with, how, about what, and the retention of recalled or sequestered Aurobindo valsartan API, including as a component of finished dose.
38. Aurobindo's product recall for valsartan finished dose, including who Aurobindo communicated with, how, about what, and the retention of recalled or sequestered Aurobindo valsartan finished dose.
39. All credits, indemnification, refunds, and/or penalties paid or provided by or to Aurobindo (i.e. to/from customers, regulatory agencies) in connection with the nitrosamine contamination of Aurobindo's valsartan API and finished dose.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Steve Lucas.
2. The complete production of Steve Lucas's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

BURSOR & FISHER, P.A.

By: /s/ Andrew J. Obergfell
Andrew J. Obergfell

Joseph I. Marchese
Andrew J. Obergfell
888 Seventh Avenue
New York, NY 10019
Telephone: (646) 837-7150
Facsimile: (212) 989-9163
Email: aobergfell@bursor.com
jmarchese@bursor.com